

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ARTHUR VARGAS, *individually and on behalf of all others similarly situated,*

Plaintiff,

v.

BARCLAYS BANK DELAWARE,

Defendant.

No. 1:24-cv-06549-LGS

**NOTICE OF MOTION TO COMPEL  
ARBITRATION**

**PLEASE TAKE NOTICE** that, pursuant to Sections 3 and 4 of the Federal Arbitration Act, *see* 9 U.S.C. §§ 3, 4, and upon the accompanying Memorandum of Law, Declaration of Christina Prusak Chianese, Declaration of Rachel Wise, and Declaration of Stephenie Beauchamp, Defendant Barclays Bank Delaware respectfully moves this Court, before the Honorable Lorna G. Schofield, U.S.D.J., at the United States Courthouse for the Southern District of New York located at 40 Foley Square, New York, NY 10007, on a date and at a time to be designated by the Court, for an order compelling arbitration and staying this proceeding pending resolution of the arbitration.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court's order dated October 15, 2024, answering papers, if any, must be served by November 22, 2024.

Dated: November 1, 2024

Amy P. Lally (*pro hac vice* forthcoming)  
SIDLEY AUSTIN LLP  
1999 Avenue of the Stars, 17th Floor  
Los Angeles, CA 90067  
Telephone: (310) 595-9500  
Facsimile: (310) 595-9501  
Email: alally@sidley.com

By: /s/ Christina Prusak Chianese  
Christina Prusak Chianese  
SIDLEY AUSTIN LLP  
787 Seventh Avenue  
New York, NY 10019  
Telephone: (212) 839-5300  
Facsimile: (212) 839-5599  
Email: cchianese@sidley.com

Ian M. Ross (*pro hac vice* forthcoming)  
SIDLEY AUSTIN LLP  
1001 Brickell Bay Drive  
Miami, FL 33131  
Telephone: (305) 391-5100  
Facsimile: (305) 391-5101  
Email: iross@sidley.com

*Counsel for Defendant Barclays Bank  
Delaware*

By **December 18, 2024**, the parties shall file a short joint stipulation and proposed protective order on confidentiality in compliance with Individual Rule I.D.4. If the parties cannot agree on the language, the parties shall submit a stipulation that contains their respective proposed language, with a courtesy copy emailed to schofield\_nysdchambers@nysd.uscourts.gov in Word format. The stipulation will not be considered as a waiver of any right to arbitrate. So Ordered.

Dated: December 12, 2024  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE